## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,

Plaintiff,

v. Civil Action No. 3:17-01362 Hon. David A. Faber

AMERISOURCEBERGEN DRUG CORPORATION, et al.

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

v. Civil Action No. 3:17-01665 Hon, David A, Faber

AMERISOURCEBERGEN DRUG CORPORATION, et al.

Defendants.

## **NOTICE OF REMOTE DEPOSITION OF KATHERINE KEYES**

Defendant Cardinal Health, Inc., by and through counsel, hereby gives notice that the remote, oral deposition of **Katherine Keyes**, will take place on **October 30, 2020**, beginning at **12:00 p.m. Eastern Time**. The deposition shall be videotaped and recorded stenographically and will be conducted before a notary public or other person authorized to administer oaths. Court reporting services and video recording services will be provided by Veritext Legal Solutions (216-523-1313; opioid@veritext.com), who will provide remote access for all parties wishing to participate via video conference or telephone.

PLEASE TAKE FURTHER NOTICE that the Deponent must have access to a laptop, computer, or tablet with web camera capability. Deponent may not use a cell phone to provide testimony. Deponent must also have the capability to view documents electronically. To the extent

Deponent is not in possession of the required technology, documents shall be provided to the

Deponent in hard copy and/or Deponent's counsel shall provide the required technology.

Recommended Specifications are below:

i. Computer

ii. Web Camera

iii. Internet Browser (Google Chrome Preferred)

iv. Minimum 10 mb/s wired, secure internet connection

At minimum, Deponent must have sufficient internet connectivity and bandwidth to support

a video deposition. Such capacity shall be sufficient to ensure that when used with the system

selected for the deposition, there shall be (a) high-quality video upload (from Deponent) and

download (to other Participants), (b) no material time discrepancy between audio and video, and (c)

consistent connectivity, with no material disruptions.

Dated: October 27, 2020

Respectfully submitted,

/s/ Steven R. Ruby

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Steven R. Ruby (WVSB No. 10752)

David R. Pogue (WWVSB No. 10806)

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Counsel for Cardinal Health, Inc.

**CERTIFICATE OF SERVICE** 

The undersigned hereby certifies that on this 27th day of October, 2020, the foregoing "Notice

of Remote Deposition of Katherine Keyes" was served using the Court's CM/ECF system, which

will send notification of such filing to all counsel of record, and via electronic mail to

mdl2804discovery@motleyrice.com and track2opioiddefendants@reedsmith.com.

Dated: Octobber 27, 2020

/s/ Steven R. Ruby

Steven R. Ruby (WVSB No. 10752)